UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.,

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

THE SPECIAL CLAIMS COMMITTEE OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH ITS MEMBERS.

and

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE PUERTO RICO ELECTRIC POWER AUTHORITY,

as co-trustees respectively, of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Plaintiff.

PROMESA Title III

Case No. 17-BK-3283 (LTS)

PROMESA Title III

Case No. 17-BK-4780 (LTS)

Adv. Proc. No. 19-00388-LTS

v.

INSPECTORATE AMERICA CORPORATION; SAYBOLT LP; ALTOL CHEMICAL ENVIRONMENTAL LABORATORY INC. D/B/A ALCHEM LABORATORY; ALTOL ENVIRONMENTAL SERVICES, INC.; CARLOS R. MÉNDEZ & ASSOCIATES; TRAFIGURA TRADING LLC; TRAFIGURA BEHEER B.V.; TRAFIGURA LIMITED; TRAFIGURA ARGENTINA S.A.; VITOL S.A., INC.; VITOL, INC.,

Defendants.

MOTION FOR AN EXTENSION OF TIME TO FILE A REPLY TO THE OPPOSITIONS TO MOTION TO INTERVENE

To the Honorable United States District Court Judge Laura Taylor Swain and the Honorable United States Magistrate Judge Judith Gail Dein:

COME NOW the Marrero plaintiffs through their undersigned counsel very respectfully state and pray:

- 1. The reply to the oppositions to the motion to intervene filed by the Marrero Plaintiffs is due November 8, 2019.
- With consent of opposing counsel, the Marrero Plaintiffs very respectfully
 ask this Court for an extension of time until November 22, 2019 to file the
 reply.

WHEREFORE, the Marrero plaintiffs ask this Honorable Court to extend the time to reply to the oppositions to their motion to intervene up to and including November 22, 2019.

Respectfully submitted this 5th day of November 2019.

By: /s/ Elizabeth A. Fegan Elizabeth A. Fegan FEGAN SCOTT LLC 150 S. Wacker Dr., 24th Floor Chicago, IL 60606 312-741-1019 312-264-0100 beth@feganscott.com

/s/ Jane A. Becker Whitaker
Jane A. Becker Whitaker
USDC NUMBER 205110
P.O. Box 9023914
San Juan, Puerto Rico 00902
Telephone: (787) 945-2406
E-mail: jbw@beckerviseppo.com

Mark T. Vazquez
HAGENS BERMAN SOBOL SHAPIRO LLP
455 N. Cityfront Plaza Dr., Suite 2410
Chicago, IL 60611
Telephone (708) 628 4040

Telephone: (708) 628-4949 Facsimile: (708) 628-4950 E-mail: markv@hbsslaw.com

Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 Telephone: (206) 623-7292

Facsimile: (206) 623-0594 E-mail: steve@hbsslaw.com

J. Barton Goplerud Andrew Howie SHINDLER, ANDERSON, GOPLERUD & WEESE P.C. 5015 Grand Ridge Drive, Suite 100 West Des Moines, IA 50265 Telephone: (515) 223-4567

E-mail: goplerud@sagwlaw.com

E-mail: howie@sagwlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via CM/ECF notification upon all parties in interest registered to receive electronic notification on this matter (which is incorporated herein by reference) on this 5th day of November 2019.

/s/ Jane Becker
Jane Becker, Esq.